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April 9, 2018

Via ECF

The Honorable Joanna Seybert United States District Court 944 Federal Plaza Central Islip, New York 11722

> United States v. Jack <u>Vitayanon</u> Criminal Docket No: 17cr080 (JS)

Dear Judge Seybert:

I represent Jack Vitayanon, the defendant in the above referenced case.

I am writing to respectfully request that Mr. Vitayanon's sentencing, currently scheduled for April 13, 2018, be adjourned to a date after June 11, 2018.

The Pre-Sentencing Report ("PSR") was not disseminated to the parties until March 28, 2018. There are extensive issues contained in the PSR that need to be addressed. Additionally, I intend to submit to the Court a detailed Sentencing Memoranda, relying in part on facts contained in the PSR. Assistant U.S Attorney Charles Rose has advised me that he will be on trial during most of month of May. Accordingly he has no objection to my application to adjourn the sentencing until June.

The Court's attention to this matter is greatly appreciated.

Respectfully Submitted,

Bradley D. Simon